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BROWNSTEIN HYATT FARBER  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

FRESH MIX, LLC,

Plaintiff,

Case No. 2:24-cv-00397-JCM-NJK

vs.

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANT BROWNSTEIN HYATT  
FARBER SCHRECK LLP TO RESPOND  
TO PLAINTIFF'S AMENDED  
COMPLAINT**

**(FIRST REQUEST)**

PISANELLI BICE, PLLC, a Nevada Law Firm  
and Professional Limited Liability Company,  
JAMES P. PISANELLI, ESQUIRE, an  
individual, DEBRA L. SPINELLI, ESQUIRE, an  
individual, AVA SCHAEFER, ESQUIRE, an  
individual, COHEN DOWD QUIGLEY PC, an  
Arizona Law Firm and Professional Corporation,  
RONALD J. COHEN, an individual, BETSY  
LAMM, an individual, DANIEL QUIGLEY, an  
individual, JENNA BROWNEE, an individual,  
BRUCE A. LESLIE, CHTD, A Nevada Firm,  
BRUCE A. LESLIE, an individual;  
BROWNSTEIN HYATT FARBER SCHRECK  
LLP; a Colorado Limited Liability Partnership;  
SAMUEL A. SCHWARTZ, an individual, and  
SCHWARTZ LAW, PLLC, and ZACHARIAH  
LARSON, an individual, and LARSON &  
ZIRZOW, LLC,

Defendants.

In accordance with Local Rules 7-1 and IA 6-1, Defendant Brownstein Hyatt Farber Schreck LLP (“BHFS”) and Plaintiff Fresh Mix, LLC (“Fresh Mix”) stipulate as follows:

1. On February 27, 2024, Fresh Mix filed its initial Complaint [ECF No. 1];
2. On March 12, 2024, Fresh Mix filed its Amended Complaint [ECF No. 8];
3. On March 20, 2024, BHFS was served with a copy of the Amended Complaint;
4. Presently, BHFS has until April 10, 2024 to respond to the Amended Complaint, *see* Fed. R. Civ. Proc. 15(a)(3);

5. Given the significant number of filings and court orders to review from the underlying bankruptcy and state court action, and the length of the Amended Complaint (203 pages, including exhibits), additional time is needed for BHFS to adequately review and respond;

6. Fresh Mix and BHFS agree to extend the deadline for BHFS to respond to the Amended Complaint until May 3, 2024; and

7. This is the first request to extend the deadline for BHFS to respond to the Amended Complaint and is sought in good faith and not for purposes of delay.

Dated this 9<sup>th</sup> day of April, 2024.

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore

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*Attorneys for Defendant*  
BROWNSTEIN HYATT FARBER  
SCHRECK LLP

Dated this 9<sup>th</sup> day of April, 2024.

LAW OFFICE OF MATTHEW L. SHARP

By: /s/ Matthew L. Sharp  
MATTHEW L. SHARP (Bar No. 4746)

- and -

STEVEN K. EISENBERG (*pro hac vice*)  
STERN & EISENBERG, P.C.

*Attorneys for Plaintiff*  
Fresh Mix, LLC

**IT IS SO ORDERED.**

  
United States Magistrate Judge

Dated: April 18, 2024